

IN THE MATTER OF
PEARL CULLER BAILEY,
JAMES THEODORE BAILEY AND
PHILLIP ROGER BAILEY

ON
P E T I T I O N

* NO. 18,779 EQUITY
*
* IN THE CIRCUIT COURT FOR
*
* FREDERICK COUNTY, MARYLAND
*
*

* * * * *

PETITION TO SELL REAL ESTATE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Robert Pendleton Bailey, Jr., Lulu Bailey Sween and Ralph L. Gastley, Jr., Substitute Trustees by Franklin D. Stillrich, their solicitor respectfully represents unto your Honorable Court:

FIRST: That your Petitioners were appointed Trustees by Order of this Honorable Court on the 16th day of September, 1982, whereby said Decree set forth that they would not sell or convey assets of the estate without prior Order of this Court.

SECOND: That on June 14, 1983 said Trustees entered into a Contract of Sale to sell certain property located at Bayview Road, Coltons Point, St. Marys County, Maryland, with a purchase price of Forty Two Thousand Dollars (\$42,000.00), copy of said Contract of Sale is attached hereto and prayed to be made a part hereof.

THIRD: That said property was appraised on April 24, 1982 for Forty Three Thousand Four Hundred Dollars (\$43,400.00), copy of said appraisal is attached hereto and prayed to be made a part hereof.

FOURTH: That said property is in the state of disrepair, needing painting and interior work and it is felt by said Trustees that said price is the best and highest price obtainable for said property which the Trustees have been able to attain.

FIFTH: That said Trustees need to sell said property in order to have monies to pay real estate taxes and expenses on the main assets which are farms lying in Frederick County.

WHEREFORE, your Petitioners pray:

1. That this Honorable Court approve the sale of the St. Marys County property to Jeffrey L. Marshall.

2. And for such other and further relief as the nature of their case may require.


Franklin D. Stillrich